

Exhibit C

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF FLORIDA
 GAINESVILLE DIVISION

4 RARE BREED TRIGGERS, LLC, a Florida
5 Limited Liability Company, and ABC IP
6 LLC, a Delaware Limited Liability Company,
Plaintiffs,

No. 1:21-cv-00149-RH-GRJ

7 | vs.

8 BIG DADDY ENTERPRISES, INC., a Florida
9 Corporation, d/b/a BIG DADDY
UNLIMITED, INC., and WIDE OPEN
ENTERPRISES, LLC, a New Mexico Limited
Liability Company d/b/a WIDE OPEN TRIGGERS,

Defendants.

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14 | VIDEOTAPED

DEPOSITION OF: LAWRENCE DEMONICO

15 (Conducted via videoconference.)

DATED: October 12, 2001

10 DATE: OCTOBER 15, 2021
11 TIME: 8:35 AM - 8:36 AM

TIME : 9:05 a.m. to 2:30 p.m.

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19 PURSUANT TO: Notice by counsel for

Defendants for purpose

discovery, use at trial

such other purposes as

permitted under the Fl

Rules of Civil Procedure

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BEFORE: KATHLEEN K. OHMAN RMP

Notary Public - State of

Recently, Radioactive, Severe
Floods

24 Florida

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1 APPEARANCES:

2 GLENN D. BELLAMY, ESQUIRE
3 Wood Herron & Evans, LLP
4 2700 Carew Tower
5 441 Vine Street
6 Cincinnati, Ohio 45202
7 Attorney for Plaintiffs

8 DANIEL C. JOHNSON, ESQUIRE
9 ELEANOR M. YOST, ESQUIRE
10 Carlton Fields, P.A.
11 4221 West Boy Scout Boulevard
12 Suite 1000
13 Tampa, Florida 33607

14 Attorney for Defendants

15 ALSO PRESENT:

16 Alex Montalvo, Videographer

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1 Q. Who else on behalf of Rare Breed was
2 involved in that sale?

3 A. I believe I was the only one involved.

4 Q. Were there any lawyers involved on either
5 side?

6 A. Well, Kevin Maxwell is a lawyer and he
7 would have -- as the owner of Rare Breed, I would
8 say, yeah, he was involved.

9 Q. With whom did you negotiate on behalf of
10 Rare Breed -- excuse me. That's a poor question.
11 With whom did you negotiate at ABC for the sale of
12 the patent to ABC?

13 [REDACTED]

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1 BY MR. JOHNSON:

2 Q. You do know with whom you negotiated the
3 purchase of the 223 patent, though, correct?

4 A. I would have to go back and look at email,
5 but I'm not going to speculate. That's for sure.

6 Q. Is that your serious answer under oath,
7 Mr. Demonico, you do not remember with whom you
8 negotiated the sale of the 223 patent to ABC?

9 A. My serious answer to you is, in order to
10 give you a very clear, precise answer, I would need
11 to go back and review email.

12 There were many discussions had, phone
13 calls, in person, lots of stuff, but who did I
14 specifically negotiate? No, I'd have to look for
15 that.

16 Q. So you just talked about phone calls,
17 in-person meetings. Who are the people on behalf of
18 ABC with whom you had those phone calls or those
19 in-person meetings?

20 A. That's not what I said anyway.

21 MR. BELLAMY: I'm going to object again.
22 The same objection as to the scope and
23 relevance.

24 I don't know if there's a potential for
25 privilege. I would need to talk to my client

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9 Q. Mr. Demonico, I'm going to go back to the
10 video we discussed a little bit, the locking bar
11 spring video, and in that video you say that it took
12 three years to bring the FRT-15 to market. Do you
13 remember saying that?

14 A. Sure.

15 Q. And what is the basis of that statement
16 when Rare Breed didn't even acquire the patent until
17 2020?

18 A. Well, that's very simple. I have been the
19 president of Rare Breed Firearms for -- you know,
20 since its existence, and I am always looking for
21 things that nobody else is doing.

22 Everybody makes AR-15s. Very few people
23 make AR-15s like the ones that Rare Breed Firearms
24 produces.

25 I had been exploring the possibility of a

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1 forced reset-type trigger for many years. Looking
2 at it as a possibility. So I had been working on,
3 you know, concepts and ideas and design for years
4 before, you know, Rare Breed Triggers was formed. I
5 mean, that's very simple.

6 Q. And you just interjected a new company,
7 Rare Breed Firearms. That's a separate legal
8 entity, correct?

9 A. It is.

10 Q. That's a Texas LLC of which you are the
11 president?

12 A. I am, and it is.

13 Q. And how long have you been the president
14 of Rare Breed Firearms?

15 A. Since it was formed.

16 Q. On Rare Breed Firearms website it says it
17 has a close relationship with Rare Breed Triggers.
18 What do you mean by that?

19 A. Well, I'm the president of both. That's
20 pretty close.

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